EXHIBIT B (Updated Privilege Log)

Case 5:23-mc-00001-LGW-BWC Document 29-2 Filed 11/29/23 Page 2 of 5

Donna Curling, et al. v. Brian P. Kemp, et al. Privilege Log

Author	Recipient	Privileges	Description	Date*
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Attorney-Work Product, Attorney- Client	Written communications between attorneys regarding responses to open records requests and the <i>Curling</i> subpoenas.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Rebekah Ditto, Esq.	Attorney-Work Product, Attorney- Client	Written communications between attorneys regarding general representation of the Board of Elections.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Stephen Delk, Esq.	Jennifer Herzog, Esq., Tony Rowell, Esq., Nick Kinsley, Esq., Stephen Delk, Esq.	Attorney-Work Product, Attorney- Client	Written communications between attorneys regarding responses to the <i>Curling</i> subpoenas.	All authors and recipients were employed by Hall Booth Smith, P.C. and served as the County Attorney for Coffee County at all relevant times.
Jennifer Herzog, Esq., Tony Rowell, Esq., Wesley Vickers (Coffee County Administrator)	Wesley Vickers, Jennifer Herzog, Esq., Tony Rowell, Esq.	Attorney-Client	Written communications regarding general representation of the Board of Elections, responding to open records requests and the <i>Curling</i> subpoenas.	Coffee County hired Wesley Vickers before July 1, 2020 (relevant time period). All communications occurred when Hall Booth Smith, P.C. or its attorneys served as County Attorney of Coffee County.
Jennifer Herzog, Esq., Nick Kinsley, Esq., Tracie Vickers (Coffee County Clerk)	Tracie Vickers, Jennifer Herzog, Esq., Nick Kinsley, Esq.	Attorney-Client	Written communications regarding responding to open records requests and the <i>Curling</i> subpoenas.	Coffee County hired Tracie Vickers before July 1, 2020 (relevant time period). All communications

Г			T	
Jennifer Herzog, Esq., Rachel Roberts (current Coffee County Elections Supervisor) Jennifer Herzog, Esq., Tony Rowell, Esq., James Barnes (former Coffee	Rachel Roberts, Jennifer Herzog, Esq. James Barnes, Jennifer Herzog, Esq., Tony Rowell, Esq.	Attorney-Client Attorney-Client	Written communications regarding responses to open records requests and the <i>Curling</i> subpoenas. Written communications regarding general elections office	occurred when Hall Booth Smith, P.C. or its attorneys served as County Attorney of Coffee County. Communications began on or after December 13, 2021 and remain ongoing. Communications (except for communications relating to the
County Elections Supervisor)			representation, responses to open records requests and the Curling subpoenas.	Curling subpoenas) began on or after April 1, 2021, 2021 and ceased on or before December 3, 2021, coinciding with James Barnes' employment with Coffee County. Communications regarding the Curling subpoenas began on July 13, 2022 and remain ongoing.
Jennifer Herzog, Esq., Misty Hampton (former Coffee County Elections Supervisor)	Misty Hampton, Jennifer Herzog, Esq.	Attorney-Client	Written communications regarding responses to open records requests.	Communications began on or after July 1, 2020 (relevant time period) and ceased on or before February 25, 2021, coinciding with Misty Hampton's employment with Coffee County.
Jennifer Herzog, Esq., Board of Elections Member(s)	Board of Elections Member(s), Jennifer Herzog, Esq.	Attorney-Client	Written communications regarding responses to open records request	Communications occurred between Jennifer Herzog and

	1	1	1.1 0 1	1 0.1
			and the Curling	members of the Board of
			subpoenas.	Elections during
				the board
				members'
				respective
				tenures as
				members of the
				board.
Jennifer Herzog,	Board of Elections	Attorney-Client	Written	Communications
Esq., Tony Rowell,	Member(s), Jennifer	Attorney-Chem	communications	occurred
Esq., Board of	Herzog, Esq., Tony		regarding various	between Jennifer
Elections Member(s)	Rowell, Esq.		elections matters.	Herzog, Tony
Licetions Wember(s)	Rowen, Esq.		ciccions matters.	Rowell and
				members of the
				Board of
				Elections during
				the board
				members'
				respective
				tenures as
				members of the
				board.
Jennifer Herzog,	Wesley Vickers,	Attorney-Work	Written	Coffee County
Esq., Wesley Vickers	Jennifer Herzog,	Product	communications	hired Wesley
1,7	Esq.		regarding SEB2020-	Vickers before
	. 1		250.	July 1, 2020
				(relevant time
				period). All
				communications
				occurred when
				Hall Booth
				Smith, P.C. or
				its attorneys
				served as
				County Attorney
				of Coffee
				County.
Tony Rowell, Esq.,	Tony Rowell, Esq.,	Attorney-Work	Written	All authors and
Nick Kinsley, Esq.,	Nick Kinsley, Esq.,	Product, Attorney-	communications	recipients were
Rebekah Ditto, Esq.	Rebekah Ditto, Esq.	Client	regarding SEB2020-	employed by
			250.	Hall Booth
				Smith, P.C. at all
				relevant times
				and served as
				the County
				Attorney for
				Coffee County
				at all relevant
Pahakah Ditta Ess		Attornov Worls	Attornov's notes	times. December 7,
Rebekah Ditto, Esq.		Attorney-Work Product	Attorney's notes	December 7, 2021 –
		Froduct	regarding SEB2020- 250	December 13,
			250	2021. However,
				Rebekah Ditto
				was employed
	1	1		was emproyed

Rebekah Ditto, Esq., Nick Kinsley, Esq., Board of Elections	Board of Elections Member(s). Rebekah Ditto, Esq.,	Attorney-Client	Written communications regarding SEB2020-	with Hall Booth Smith, P.C., which served as County Attorney for Coffee County at this time. December 7, 2021 – December 13,
Member(s)	Nick Kinsley, Esq.		250	2021. All communications occurred during the board members' respective tenures as members of the board.
Rebekah Ditto, Esq., Wesley Vickers, Rachel Roberts	Wesley Vickers, Rachel Roberts, Rebekah Ditto, Esq.		Written communications regarding SEB2020-	December 14, 2021 – December 15,
Racher Roberts	Rebekan Ditto, Esq.		250.	2021
Board of Elections Member(s)	Rebekah Ditto, Esq.	Attorney-Client, Work Product	Diagram for defense of SEB2020-250	December 13, 2021
Jennifer Herzog,	Greg Hecht, Esq.,	Attorney-Client, Work Product	Written	July 13, 2022 -
Esq., Greg Hecht, Esq., and Ed	Ed Buckley, Esq., Jennifer Herzog,	WOIK Product	communications regarding	present
Buckley, Esq.	Esq.		representation of Ms. Earnestine Thomas-Clark relating to Curling and Secretary of State.	

F.R.C.P. 26(b)(5)(A)(ii) only requires that the party describe the nature of the privileged material in a manner that will enable you to assess the claim. If you assert that a date is required, please provide the citation for same so that we may consider the matter further. The information provided above allows you to sufficiently assess the asserted privileges. The date is largely irrelevant as the dates of employment and the dates of holding positions on the board encompass the "relevant time period." With the exception of James Barnes, who expressly retained our firm to represent him in responding to the Curling subpoenas, communications with employees or representatives of Coffee County occurred only during their tenure with Coffee County. It would be unduly burdensome to non-party Coffee County to require the identification of these irrelevant dates.